

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

FUSION ELITE ALL STARS et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC et al.,

Defendants.

Civ. Action No. 2:20-cv-2600-tmp

JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY

The Parties, including all Plaintiffs and all Defendants, hereby notify the Court that they have reached an agreement in principle to settle the claims of Plaintiffs and two proposed direct purchaser classes in this litigation. The Parties are drafting a formal settlement agreement and anticipate that Plaintiffs will present a motion for preliminary approval of the settlement, for certification of the classes in light of settlement, and for a plan to provide class notice consistent with due process to the classes, for the Court's consideration in the near future.

To promote judicial economy and preserve resources, the Parties respectfully request the Court to stay all deadlines in this matter pending submission of the motion for preliminary approval of the settlement agreement.

Dated: January 31, 2023

Respectfully submitted,

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